Xerox Docket No. D/99626

PATENT APPLICATION 11-5-03

RESPONSE UNDER 37 CFR §1.116
EXPEDITED PROCEDURE
TECHNOLOGY CENTER ART UNIT 2623

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of

Dan S. BLOOMBERG et al.   Group Art Unit: 2623

Application No.:   09/487,583   Examiner: J. Wu

Filed: January 19, 2000   Docket No.:   104324

For: METHODS FOR GENERATING ANTI-ALIASED TEXT AND LINE GRAPHICS IN
       COMPRESSED DOCUMENT IMAGES

REQUEST FOR RECONSIDERATION

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In reply to the September 8, 2003 Office Action, reconsideration of the above-identified application is respectfully requested in light of the following remarks.

Claims 1-24, 26-31 and 39-67 are pending in this application. Applicants gratefully acknowledge that the Final Office Action indicates that claims 26 and 49-53 include allowable subject matter.

I.   **Response to Restriction Requirement**

Applicants appreciate that at page 3, lines 7-9, of the Final Office Action, the Examiner agrees that Species I, II and III can be prosecuted together.

At page 4, lines 6-15 of the Office Action, the Office Action asserts that the feature of "grayscale tokens" found in claims 61-67 is not contained in the elected species IV. Applicants disagree.

The feature of grayscale tokens may be found, for example, in claim 50, which is a claim included within elected species IV. Therefore, rejoinder of claims 61-67 is requested.

II.   The Claims Define Patentable Subject Matter

The Office Action rejects claims 1-3, 23-24, 27, 30-31 and 39 under 35 U.S.C. §103(a) over Jozefowski (GB 2247596) in view of Smith (EP 0590923). This rejection is respectfully traversed.

The Applicants' arguments in the Amendment filed June 19, 2003, and the arguments submitted in the Supplemental Response filed July 16, 2003, are hereby incorporated by reference.

At page 5, lines 5-9, the Office Action asserts "in response to Applicant's argument, the Examiner would like to point out that claim language is given its broadest reasonable interpretation. The specification is not measure of invention. Therefore, limitations contained therein cannot be read into the claims for the purpose of avoiding the prior art." Applicants respectfully submit that the arguments submitted in the Amendment filed June 19, 2003, and in the Supplemental Response filed July 16, 2003, did not attempt to read into the claims, features or limitations of the specification for the purpose of avoiding or overcoming the applied references. Instead, the arguments submitted in the prior Amendment and Supplemental Response, and the arguments submitted herein in this Request for Reconsideration, are directed solely to the features recited in the claims, and not to any additional features or limitations found in the specification. Applicants' arguments are

directed to the proper interpretation of the applied references, not the scope of the rejected claims.

At page 5, lines 9-15, the Office Action asserts that Jozefowski separates interior/exterior pixels by giving different "classifications" 1-4 to pixels on a boundary of the line as shown in Fig. 2B. Applicants respectfully disagree.

"Classification" 1 (element 26) of Fig. 2B is found on both sides of the line shown in the Figure. "Classification" 1 (element 26) is found on top of the line at coordinate (7,6), and "Classification" 1 (element 26) is found on the bottom of the line and coordinate (6,4). If these "classifications" were used to designate or separate interior and exterior boundary pixels, as asserted by the Office Action, then a particular "classification" would only appear on one side of the line, and not the other. That is not the case, as clearly shown in Fig. 2B.

Instead, as discussed in the Supplemental Response, Fig. 2B shows a lower resolution line than the line of Fig. 2A, with anti-aliasing.

At page 5, lines 15-20, the Office Action asserts that Jozefowski can identify and separate interior boundary pixels from exterior boundary pixels in a one dimensional array of pixels, because "It is well known in the art to separate boundary pixels and non-boundary pixels by setting the pixels for different status/classification. Once the setting is done, one can easily separate the pixels in one direction, either horizontal or vertical." Applicants respectfully disagree.

The system of Jozefowski views pixels as a one dimensional array, and draws images using the one dimensional array in scan line order (see Jozefowski, page 21, lines 29-31). There is thus no space in Jozefowski's one dimensional array to set the pixels to correspond to different status or classifications. In order to store pixels with corresponding interior or exterior classifications, at least a two dimensional array would be needed: one dimension to

store the pixels, and another different dimension to store the interior/exterior classifications corresponding to the stored pixels. Jozefowski fails to describe, teach or suggest any such interior/exterior classification of pixels, and even if it were well known in the art to separate interior/exterior boundary pixels (which the Applicants do not admit), Applicants submit that it could not be achieved with the one dimensional array used by Jozefowski, for at least the reasons described above.

At page 5, lines 21-25, the Office Action asserts, <u>without citing any textual support</u> in the specification of Jozefowski, that Figs. 5A and 6A teach separating boundary and non-boundary pixels, because, according to the Office Action, pixels having a "1" are boundary pixels and pixels having a "0" are not. Applicants respectfully disagree.

Jozefowski describes the stored 1s of Fig. 5A as the stored numeric values representing part of a thick straight line (see page 24, lines 25-27 of Jozefowski). Thus, the 1s designate picture elements. The 0s (or blank spaces or sections) designate a lack of a picture element. Thus, the 1s and 0s of Jozefowski do <u>not</u> correspond to boundary and non-boundary pixels as asserted by the Office Action. Therefore, Jozefowski fails to describe, teach or suggest separating boundary from non-boundary pixels.

Jozefowski has no need to separate the pixels into boundary pixels and non-boundary pixels, as recited in claims 30, 31 and 39-59, let alone to separate boundary pixels into interior boundary pixels and exterior boundary pixels, as recited in claims 1-24 and 26-29. Therefore, it is respectfully submitted that Jozefowski fails to teach or suggest all of the recited features of claims 1-24, 26-31, 39-59 and 61-67. Withdrawal of the 35 U.S.C. §103(a) rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in

condition for allowance. Favorable reconsideration and prompt allowance of claims 1-24, 26-

31, 39-59 and 61-67 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place

this application in even better condition for allowance, the Examiner is invited to contact the

undersigned at the telephone number listed below.

Respectfully submitted,

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